

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

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Federal Communications Commission
Office of Secretary

IN THE MATTER OF:)	MB DOCKET NO. 05-267
)	
<i>Amendment of 47 C.F.R. §73.202(b)</i>)	RM-10365
<i>Table of FM Allotments</i>)	RM-11278
(St. Simons Island, Georgia))	
)	
Reclassification of License)	
of FM Station WOGK, Ocala, Florida)	
)	
To: Marlene H. Dortch, Secretary, FCC)	
ATTN: Chief, Audio Division)	

COMMENTS OF MURPHY BROADCASTING

Comes now MURPHY BROADCASTING ("Murphy"), by Counsel and pursuant to Section 1.415 of the Commission's Rules, hereby respectfully submits its Comments in support of the *Notice of Proposed Rule Making*, DA 05-267 (released September 27, 2005) ("*NPRM*") in the above-captioned rule making proceeding to amend the Table of FM Allotments Section 73.202(b) of the Rules, to add Channel 229C3 at St. Simons Island, Georgia, as the community's second local aural transmission service. In support whereof, the following is shown:

Public Interest Consideration

1. Murphy hereby incorporates its prior Petition by reference herein and the Petition for Rule Making filed by Nancy C. Harper ("Harper Petition"). As set forth in its original Petition, Murphy believes the public interest will be served by adopting the proposed amendment since it will provide St. Simons, Island, Georgia with its second local aural transmission in the service area. This new service will promote the Commission's goal of enhancing diversity of thought and opinion in the broadcast media as well as the charge of

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Congress to the Commission to ensure a fair, efficient, and equitable distribution of radio services in the United States¹.

Statement of Continuing Interest

2. Murphy hereby reiterates its intention that, should the Commission grant and ultimately adopt the proposed amendments to the FM Table of Allotments set forth in the *NPRM*, Murphy will file an application and/or participate in an auction filing in which to obtain rights to the proposed Channel 229C3 at St. Simons Island, Georgia. In the event there are issues which prevent the approval of the Harper Petition "Class C3" allotment, Murphy states it has continued interest in Channel 229A which was proposed in its September 23, 2002 Petition for Rule Making.

Conclusion

WHEREFORE, the above premises considered, Petitioner respectfully urges that the Commission GRANT its Petition for Rule Making, and AMEND Section 73.202(b) of the Rules, FM Table of Allotments, as follows:

<i>Community</i>	<i>Present</i>	<i>Proposed</i>
St. Simons Island, Georgia	224A	224A, 229C3
Ocala, Florida	224A, 229C	224A, 229C0

Or Alternatively

St. Simons Island, Georgia	224A	224A, 229A
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¹47 U.S.C. §307(b)

Respectfully submitted,

MURPHY BROADCASTING

By: 

John C. Trent
Its Attorney

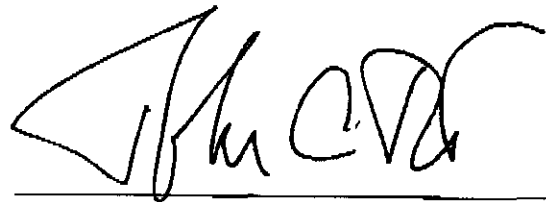
November 14, 2005

Putbrey Hunsaker & Trent, P.C.
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Woodstock VA 22664
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Certificate of Service

I, John C. Trent, counsel to Murphy Broadcasting, do hereby certify that I have on the 14th day of November, 2005, caused to be mailed by first class mail, postage prepaid, copies of the forgoing Comments to the following:

Nancy C. Harper
480 Wight Road
Tignall, Georgia

A handwritten signature in black ink, appearing to read "John C. Trent", written over a horizontal line.

John C. Trent, Esquire